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**From:** Ortiz, Diana  
**Sent:** Thursday, May 28, 2015 11:21 AM  
**To:** Lane, Leticia; Langley, Shirley; R6 6SF FOIA Info; R6 6SF FOIA Team  
**Subject:** GISHAM FOIA REQUEST: FW: Arkwood Superfund Site, EPA ID: ARD084930148, Site ID: 06A3 - Request for information and official position  
**Attachments:** 20130917 - FW Arkwood Inc Congressional Inquiry on Superfund Site in Boone County Arkansas.pdf; ATT00001.htm; 20131028 Weaver to Grisham Jr.pdf; ATT00002.htm; EPA response - FW Arkwood Inc Congressional Inquiry on Superfund Site in Boone County Arkansas.pdf; ATT00003.htm

Leticia,

Please see Gloria's e-mail below. Grisham is submitting 2 FOIA REQUEST.

*Diana Ortiz*  
*Superfund FOIA Coordinator*  
*Information Management Team (6SF-VJ)*  
*(214) 665-7315*

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**From:** Moran, Gloria  
**Sent:** Wednesday, May 27, 2015 3:01 PM  
**To:** Patrick, Dwayne; Ortiz, Diana  
**Subject:** FW: Arkwood Superfund Site, EPA ID: ARD084930148, Site ID: 06A3 - Request for information and official position

Hello Dwayne and Dee Dee:

Please treat the email below from Curt Grisham to Stephen Tzhone dated May 15, 2015 as a request under FOIA. As appropriate, if Mr. Grisham's requests to the EPA can be answered with responsive documents, such documents should be provided.

Thank you,

*Gloria Moran*

Assistant Regional Counsel (6RC-S)

Superfund Branch

U.S. Environmental Protection Agency, Region 6

1445 Ross Avenue

Dallas, Texas 75202

214-665-3193 (phone)

214-665-6460 (fax)



9600296

[moran.gloria-small@epa.gov](mailto:moran.gloria-small@epa.gov)

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**From:** Tzhone, Stephen

**Sent:** Friday, May 15, 2015 10:21 AM

**To:** CC Grisham

**Cc:** Moran, Gloria; Sanchez, Carlos; Meyer, John; Peycke, Mark

**Subject:** FW: Arkwood Superfund Site, EPA ID: ARD084930148, Site ID: 06A3 - Request for information and official position

Hi Curt,

I have forwarded your request to Gloria Moran, the site attorney.

I informed her that you called yesterday regarding legal matters and that this is the follow up request to that call.

Thanks,

Stephen L. Tzhone

Superfund Remedial Project Manager

214.665.8409

[tzhone.stephen@epa.gov](mailto:tzhone.stephen@epa.gov)

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**From:** CC Grisham [[mailto:grish@me.com](mailto:mailto:grish@me.com)]

**Sent:** Thursday, May 14, 2015 9:55 PM

**To:** Tzhone, Stephen

**Cc:** Charles Curtis Grisham Jr.; [Kyle.Weaver@mail.house.gov](mailto:Kyle.Weaver@mail.house.gov); [womack@mail.house.gov](mailto:womack@mail.house.gov); [adrielle.churchill@mail.house.gov](mailto:adrielle.churchill@mail.house.gov); [french.hill@mail.house.gov](mailto:french.hill@mail.house.gov); [katie.beck@governor.arkansas.gov](mailto:katie.beck@governor.arkansas.gov); [mpreston@arkansasedc.com](mailto:mpreston@arkansasedc.com)

**Subject:** Arkwood Superfund Site, EPA ID: ARD084930148, Site ID: 06A3 - Request for information and official position

Dear Stephen:

I would like to request the following information please:

1) On September 17, 2013 U.S. Congressman Steve Womack's Projects Director Kyle Weaver wrote to EPA Region 6 Congressional Liaison LaWanda Thomas regarding Arkwood's "Site Score of 28.95 on the Hazard Ranking System" (please see attached):

**"Additionally, I find that the Arkwood site has the lowest Site Score for all Final NPL sites currently in EPA Region 6."**

Can you confirm that this statement was correct at that time and whether it is still the case? What are all the other "Final NPL" sites in Region 6 and their Hazard Ranking System "scores"?

2) Could EPA Region 6 Superfund summarize Arkwood's status in a one- or two-page précis that includes (but is not necessarily limited to) EPA's current position on the site with regard to: a) its prospects for future industrial use; b) the major steps planned to help realize those prospects or to rule them out, with timeline; c) the risk the site poses to human health and the environment; and d) remaining milestones that must be achieved before the site can be proposed for deletion from NPL, with timeline?

3) Sometime between September 17, 2013 and September 30, 2013, EPA Region 6 Congressional Liaison LaWanda Thomas provided responses to U.S. Congressman Steve Womack's Projects Director Kyle Weaver's inquiry (please see attached) which included the following statement:

**"Arkwood can return to productive use at any time, provided that the remedy is not compromised. The remedy that cannot be compromised consists of addressing the soil and groundwater to numerical cleanup goals as specified in the 1990 Record of Decision (and to be updated with the dioxin re-evaluation) and institutional controls."**

Could EPA please clarify and expand upon this statement?

4) On October 28, 2013 U.S. Congressman Steve Womack's Projects Director Kyle Weaver wrote to me (please see attached):

**"Congressman Womack's office noted to the EPA that this is an ongoing issue despite nearly 25 years working on it. Our office was assured that EPA is making an effort to expedite clean-up to reach the point of deletion from the NPL. Their response to our inquiry specifically said, 'This site is one of the earliest sites nationwide going through dioxin re-evaluation. EPA will work closely with the landowner, McKesson Corporation, and ADEQ to expedite the cleanup process.'"**

Can EPA confirm that the above assessment was an accurate characterization of EPA's intent with regard to Arkwood at the time of Mr. Weaver's writing? If so, has that intent changed since the time of Mr. Weaver's writing? Could EPA please reiterate and update its current position with regard to Mr. Weaver's questions and concerns contained in the full text of the Congressional inquiry and with reference to EPA responses from Ms. Thomas, as attached hereto?

Thank you.

Sincerely,

Curt

**From:** Weaver, Kyle Kyle.Weaver@mail.house.gov ■  
**Subject:** FW: Arkwood, Inc. - Congressional Inquiry on Superfund Site in Boone County, Arkansas  
**Date:** September 17, 2013 at 10:25 AM  
**To:** CC Grisham grish@me.com

WK

Curt,

I am providing for your record the initial congressional inquiry I filed today with my congressional liaison at EPA Region 6. (see below) Please note that you should continue to use your established channel of communication with EPA Region 6, as my contact is for congressional affairs only. However, I wanted to ensure you had a copy of what I sent so you know I started my end of the process. Also, I included the other individuals you have contacted in Rep. Crawford's office, Sen. Pryor's office and in the Governor's office on my email so we are all aware of the inquiry I made. Additionally, I would note that I have included Rep. Griffin's office as I saw the address on your general authorization form was in Van Buren County, which is in Congressman Griffin's district making you his constituent.

Please note that I realize your issues with this entire process extend beyond the scope of my initial inquiry. My intent with this inquiry was to specifically focus on the aspects of the issue pertaining to delisting from the NPL and returning to a productive use.

**Kyle Weaver** | *Projects Director*  
Congressman Steve Womack, AR-3

p: 479-464-0446|f: 479-464-0063|a: 3333 Pinnacle Hills Parkway, Suite 120, Rogers, AR 72758



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From: Weaver, Kyle  
Sent: Tuesday, September 17, 2013 12:16 PM  
To: 'Thomas, LaWanda'  
Cc: 'Hall, Russell (Pryor)'; Vogelpohl, Carl; Sherrod, Jay; 'tim.gauger@arkansas.gov'  
Subject: Arkwood, Inc. - Congressional Inquiry on Superfund Site in Boone County, Arkansas  
Importance: High

Ms. Thomas,

Last week, I was contacted by a Mr. CC "Curt" Grisham, Jr., of Shirley, Arkansas, about EPA Superfund Site Arkwood, Inc., in Boone County, Arkansas. (EPA ID# ARD084930148; Site ID: 0600124). Mr. Grisham related a number of concerns about the progress being made to remediate the Arkwood site so it can be eventually delisted from the NPL and returned to a productive use.

I understand that Mr. Grisham has an open and ongoing dialogue with the EPA as a family intermediary on behalf of his father CC "Bud" Grisham, Sr., executor of the Mary F. Burke Grisham Estate that owns the land where the Arkwood site is located. I also understand that the Responsible Party for this site was formerly MMI and is now McKesson Corporation. As Shirley, Arkansas, is located in Congressman Griffin's district, I have informed his office that I am making this inquiry on behalf of their constituent and will keep them aware of any information related to this issue. Additionally, I am keeping other

congressional and state offices I know Mr. Grisham has contacted aware of this inquiry. However, as the site is in the Third Congressional District of Arkansas and Boone County – and its residents – would benefit from the resolution of this issue, I am making this inquiry on behalf of Congressman Steve Womack.

As I understand it in very broad terms, EPA's involvement with Arkwood began in the 1980's. Since that time, it appears that soil remediation was conducted and completed in the 90's but ground water contingency remedy is ongoing. Here are the initial questions I have:

- The Superfund Information Systems EPA Superfund Site Progress Profile for Arkwood indicates the following, and I would like this information confirmed:
  - Current human exposures at this site are under control.
  - Contaminated ground water migration is under control.
  - Physical cleanup activities have been completed, with construction complete on June 28, 1996.
  - The only major site cleanup milestone not yet reached is deletion from the NPL.
  - EPA has determined that the Arkwood site meets the criteria for Site-wide Ready for Anticipated Use, meaning that all cleanup goals have been achieved for both current and reasonably anticipated future land use.
- I understand that Arkwood has a Site Score of 28.95 on the Hazard Ranking System that considers ground water migration, surface water migration, soil exposure and air migration. I also understand that the minimum site score to be listed on the NPL is 28.50. Having reviewed the current list of 1,320 Final NPL sites, I see that Arkwood is among the 1.8% of sites nationally that are within a half-point of the cut-off for listing on the NPL. Additionally, I find that the Arkwood site has the lowest Site Score for all Final NPL sites currently in EPA Region 6. While I know the Site Score is a screening tool and not a site specific risk assessment, it is the primary criterion EPA uses to determine whether a site should be placed on the NPL in the first place. As the site barely surpasses the HRS score threshold for NPL consideration, it would seem to me – from a layman's perspective – that Arkwood would be low-hanging fruit in terms of seeing the cleanup process through to deletion from the NPL. However, nearly 25 years have transpired since Arkwood was listed as final on March 31, 1989. Recognizing that much work has transpired in the interim, I would like to know:
  - Where is this site in the clean-up process in terms of meeting the requirements for deletion from the NPL?
  - What steps must be taken to complete the clean-up process and delete Arkwood from the NPL?
  - What is the expected/anticipated/estimated time it will take to reach the goal of completion of the clean-up process so a decision can be made for the site to be deleted from NPL?
  - What – if any – factors in this case have, or continue to, present obstacles to reaching a conclusion in the clean-up progress and deletion from the NPL?
    - § Mr. Grisham has expressed concerns about apparent differences between EPA and ADEQ regarding the remedial goal for PCP levels. Are the proper standards/criteria/screening levels being applied?
    - § Mr. Grisham mentioned that concerns regarding dioxin levels recently developed due not to a change at that site but an EPA reassessment of dioxin toxicity. How does this factor into the clean-up progress?
    - § Are there any other chemicals present on site that present a concern?
  - What efforts are being made to accelerate/expedite this cleanup to reach the point of

deletion from the NPL?

- Mr. Grisham has cited a letter from the late 1980's that indicated at that time an expectation existed for the completion of this process to be relatively quick. In a letter dated Nov. 4, 1989, the then director of the EPA Region 6 Superfund Division stated to the Boone County judge that "However, cleanup of the groundwater New Cricket Spring, is anticipated soon. As soon as this happens EPA plans to delist the site from the NPL and return it to productive use."
  - What changed from that time to postpone the expressed optimism of the outcome, still unrealized to this day?
  - What is the timeframe for Arkwood's return to productive use?
- As the primary focus of my inquiry relates to deletion from the NPL (with return to a productive use so the site can become an economic development opportunity a close second) I request that any information pertaining to the process not addressed by my questions be explained so I have a clear understanding of what is involved to bring Arkwood to that point.

I look forward to hearing from the EPA regarding the Arkwood site in response to this inquiry.

Thank you.

**Kyle Weaver***Projects Director*  
Congressman Steve Womack, AR-3

p: 479-464-0446|f: 479-464-0063|a: 3333 Pinnacle Hills Parkway, Suite 120, Rogers, AR 72758



From: **Weaver, Kyle** Kyle.Weaver@mail.house.gov ■  
Subject: FW: Arkwood, Inc. - Congressional Inquiry on Superfund Site in Boone County, Arkansas  
Date: September 30, 2013 at 10:34 AM  
To: Curt Grisham grish@me.com

WK

Curt,

While I was out on a statewide Ag Tour late last week, my congressional liaison provided the answers to the initial questions I posed. I wanted to share these answers with you. Now that I have made an initial request, registered congressional interest and received a response at the Regional level, I am wanting to loop in a colleague. She's the Legislative Counsel in our DC office and works on environmental issues for Congressman Womack. I feel it is important to involve her at this time. I am going to bring her up to speed and she will have access to the information you provided me so we can review it together. When she is briefed, I'd like to schedule a call between the three of us so we can discuss the latest information and possible next steps. While I would like to set up the call in the next day or two, the possibility of a government shutdown makes the current situation fluid. Once I have an idea of a date/time that works on our end, I'll circle back to you and see if it works with you.

In the interim, I encourage you to allow our office to work on this issue for you as I note being copied on your recent email to the OIG stating your concerns. Our office has only just begun looking into this.

Thank you.

**Kyle Weaver** | *Projects Director*  
Congressman Steve Womack, AR-3

p: 479-464-0446|f: 479-464-0063|a: 3333 Pinnacle Hills Parkway, Suite 120, Rogers, AR 72758



## EPA Response

1. The Superfund Information Systems EPA Superfund Site Progress Profile for Arkwood indicates the following, and I would like this information confirmed:

- Current human exposures at this site are under control.

**Answer:** Yes; however, EPA is in the process of verifying if human exposures remains under control. This verification is due to a request for partial deletion of the site from the NPL list.

- Contaminated ground water migration is under control.

**Answer:** Yes; however, EPA is in the process of verifying if contaminated ground water migration remains under control. This verification is due to a request for partial deletion of the site from the NPL list.

- Physical cleanup activities have been completed, with construction complete on June 28, 1996.

**Answer:** Yes.

1.

- The only major site cleanup milestone not yet reached is deletion from the NPL.

**Answer:** No, the Superfund statute requires that cleanup remedies meet site cleanup goals and standards; thus, the groundwater cleanup must achieve Arkansas Water Quality Standards.

- EPA has determined that the Arkwood site meets the criteria for Site-wide Ready for Anticipated Use, meaning that all cleanup goals have been achieved for both current and reasonably anticipated future land use.

**Answer:** Yes; however, EPA is in the process of verifying if the site still meets the criteria for Site-wide Ready for Anticipated Use. This verification is due to a request for partial deletion of the site from the NPL list.

2. I understand that Arkwood has a Site Score of 28.95 on the Hazard Ranking System that considers ground water migration, surface water migration, soil exposure and air migration. I also understand that the minimum site score to be listed on the NPL is 28.50. Having reviewed the current list of 1,320 Final NPL sites, I see that Arkwood is among the 1.8% of sites nationally that are within a half-point of the cut-off for listing on the NPL. Additionally, I find that the Arkwood site has the lowest Site Score for all Final NPL sites currently in EPA Region 6. While I know the Site Score is a screening tool and not a site specific risk assessment, it is the primary criterion EPA uses to determine whether a site should be placed on the NPL in the first place. As the site barely surpasses the HRS score threshold for NPL consideration, it would seem to me – from a layman’s perspective – that Arkwood would be low-hanging fruit in terms of seeing the cleanup process through to deletion from the NPL. However, nearly 25 years have transpired since Arkwood was listed as final on March 31, 1989. Recognizing that much work has transpired in the interim, I would like to know:

- Where is this site in the clean-up process in terms of meeting the requirements for deletion from the NPL?

**Answer:** The requirements for NPL deletion are found at:

[http://www.epa.gov/superfund/programs/npl\\_hrs/nploff.htm](http://www.epa.gov/superfund/programs/npl_hrs/nploff.htm) For this site, the dioxin re-evaluation and any subsequent actions must be completed. In addition, the PCP in groundwater must achieve Arkansas Water Quality Standards and corrected institutional controls must be in place.

- What steps must be taken to complete the clean-up process and delete Arkwood from the NPL?

**Answer:** Please see above.

- What is the expected/anticipated/estimated time it will take to reach the goal of completion of the clean-up process so a decision can be made for the site to be deleted from NPL?

**Answer:** For soil, the site dioxin re-evaluation is planned for completion in September 2014. Afterwards, any subsequent actions, if identified by the re-evaluation, must be implemented as well and the timeframe for these actions is unknown. For groundwater, PCP must achieve Arkansas Water Quality Standards and the timeframe for that is unknown. For institutional controls, that should be completed by December



2013, assuming agreement between the landowner, EPA, and ADEQ.

- What – if any – factors in this case have, or continue to, present obstacles to reaching a conclusion in the clean-up progress and deletion from the NPL?

**Answer:** The main factor is the change in the estimate of dioxin toxicity and potential changes to preliminary remedial goals. The second factor is that PCP in groundwater have not achieved Arkansas Water Quality Standards. The third factor is that corrected institutional controls need to be implemented.

3. Mr. Grisham has expressed concerns about apparent differences between EPA and ADEQ regarding the remedial goal for PCP levels. Are the proper standards/criteria/screening levels being applied?

**Answer:** Currently being verified. The 1990 Record Of Decision applies Arkansas Water Quality Standards for the groundwater remedy. In November 2012, ADEQ advised EPA of changes in its standards to be applied. Then in December 2012 and August 2013, McKesson Corporation and Mr. Curt Grisham provided comments on this change respectively. ADEQ is in the process of considering their comments and will advise EPA of any changes to its position. Afterwards, EPA will make a final determination.

4. Mr. Grisham mentioned that concerns regarding dioxin levels recently developed due not to a change at that site but an EPA reassessment of dioxin toxicity. How does this factor into the clean-up progress?

**Answer:** Site dioxin is being re-evaluated based upon EPA's 2012 reassessment of dioxin toxicity. For additional information please see Questions and Answers here:  
<http://epa.gov/superfund/health/contaminants/dioxin/dioxinsoil.html>

5. Are there any other chemicals present on site that present a concern?

**Answer:** The contaminants at the site are: Pentachlorophenol (PCP), Dioxin, and Polynuclear Aromatic Hydrocarbons (expressed as Benzo(a)pyrene equivalents).

6. What efforts are being made to accelerate/expedite this cleanup to reach the point of deletion from the NPL?

**Answer:** This site is one of the earliest sites nationwide going through dioxin re-evaluation. EPA will work closely with the landowner, McKesson Corporation, and ADEQ to expedite the cleanup process.

7. Mr. Grisham has cited a letter from the late 1980's that indicated at that time an expectation existed for the completion of this process to be relatively quick. In a letter dated Nov. 4, 1989, the then director of the EPA Region 6 Superfund Division stated to the Boone County judge that "However, cleanup of the groundwater New Cricket Spring, is anticipated soon. As soon as this happens EPA plans to delist the site from the NPL and return it to productive use."
  - What changed from that time to postpone the expressed optimism of the outcome, still unrealized to this day?

**Answer:** From 1989 to present, the groundwater has not achieved its cleanup goal (i.e., the Arkansas Water Quality Standards). In addition, based upon more recent science, the EPA's position on dioxin changed in 2012, which necessitated a re-evaluation of the soil remedy.

- What is the timeframe for Arkwood's return to productive use?

**Answer:** Arkwood can return to productive use at any time, provided that the remedy is not compromised. The remedy that cannot be compromised consists of addressing the soil and groundwater to numerical cleanup goals as specified in the 1990 Record of Decision (and to be updated with the dioxin re-evaluation) and institutional controls.

From: **Weaver, Kyle** Kyle.Weaver@mail.house.gov ■  
Subject: Follow-Up  
Date: October 28, 2013 at 2:54 PM  
To: CC Grisham grish@me.com  
Cc: Churchill, Adrielle Adrielle.Churchill@mail.house.gov

WK

Curt,

I recently had the opportunity to review the Arkwood issue with Adrielle Churchill, Congressman Womack's legislative counsel.

Based on the discussions we've had, the response to my initial inquiry and the interagency summary notes from the September 5<sup>th</sup> meeting provided by EPA, the following represents our current understanding of the issue pertaining to delisting from the NPL and returning to a productive use:

- Ø The Arkwood site has had the attention of many people at EPA Region 6, EPA HQ and ADEQ over the years. The attendee list for the Sept. 5, 2013, meeting noted the involvement of 12 people from EPA and 10 from ADEQ.
- Ø A congressional inquiry into the status of the clean-up of this site – including questions that specifically focused on the aspects of the issue pertaining to delisting from the NPL and returning to a productive use – following the September 5<sup>th</sup> meeting was sent by our office on September 26<sup>th</sup> and received, processed and replied to by EPA on Oct. 18<sup>th</sup>.
- Ø Additionally, Congressman Griffin's office, Congressman Crawford's office and Senator Pryor's office were informed by our office of both our inquiry and the response we received as these offices were previously or subsequently contacted in relation to my initial conversation with you.
- Ø Tim Gauger, chief legal counsel in Governor Beebe's office, has been engaged in this issue. Our office has supplied him with both the response to our inquiry as well as the summary notes EPA provided you from the September 5<sup>th</sup> meeting. Subsequent to receiving the EPA response to our inquiry, I spoke with Tim about it. As ADEQ is a state agency, it was agreed that it would be most appropriate for the Governor's office to look into the concerns related to ADEQ and the Arkansas Water Quality Standard as it is being applied in this case.
- Ø EPA has said that the Arkwood site can return to productive use at any time, provided that the remedy, and any updates due to the dioxin re-evaluation, is not compromised.
- Ø Both the EPA response and the summary notes provide three factors needed to be addressed in order to reach a conclusion in the clean-up progress and deletion of the site from the NPL, and two of those factors included a timeline when certain goals are expected to be met:
  - § December 2013 – site institutional controls to be completed (assuming agreement by all parties involved)
  - § September 2014 – site dioxin re-evaluation to be completed assuming the following schedule:
    1. Fall/Winter 2013 – approval of the conceptual site model and field sampling plans by EPA Region 6 with concurrence by EPA HQ and ADEQ;
    2. Winter 2013/Spring 2014 – field sampling conducted with subsequent data validation; and
    3. Spring/Summer 2014 – data interpretation with a site dioxin re-evaluation report finalized by September.
  - § Site achievement of Arkansas Water Quality Standards for PCP in the groundwater have not been achieved as specified in the 1990 Record of Decision.
- Ø Congressman Womack's office noted to the EPA that this is an ongoing issue despite nearly 25

years working on it. Our office was assured that EPA is making an effort to expedite clean-up to reach the point of deletion from the NPL. Their response to our inquiry specifically said, **“This site is one of the earliest sites nationwide going through dioxin re-evaluation. EPA will work closely with the landowner, McKesson Corporation, and ADEQ to expedite the cleanup process.”** (*emphasis added*)

It appears that EPA has been responsive to our questions and provided clear and direct answers to the existing issues and the expected timeline going forward. At this point in the process, as it pertains to the issue of delisting from the NPL and returning to a productive use, we feel that we have carried this inquiry as far as possible. However, I will keep your case on file as I recognize this is a multi-year issue going forward and is the Third Congressional District’s sole Superfund site. Should you have any issue with EPA or ADEQ providing timely responses to questions specific to the issue of delisting from the NPL and returning to a productive use, please let me know. I can always reopen the case and make a new inquiry to assist with obtaining information pertaining to project status or questions that are not being addressed if that is the case. That is why I bolded the last sentence in my review above. Our office was promised by EPA that it “...will work closely with the landowner, McKesson Corporation, and ADEQ to expedite the cleanup process.” I know you have felt such cooperation hasn’t occurred historically, and Congressman Womack’s office is willing to hold EPA to their word should you experience anything different going forward.

Thank you.

\*\* Please note that I realize your issues with this entire process extend beyond the scope of my inquiry. (This includes but is not limited to issues pertaining to the validity of the original listing of the site, past FOI concerns, property-owner liability, etc.) There are some aspects of the Arkwood site issue that may or may not require legal representation on your family’s behalf, and our office has neither the jurisdiction or authority to provide legal counsel and support.

**Kyle Weaver** | *Projects Director*  
Congressman Steve Womack, AR-3

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